

REDACTED – FOR PUBLIC INSPECTION
**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules To)	
Ensure Compatibility with Enhanced 911)	CC Docket No. 94-102
Emergency Calling Systems)	
)	
Request for Waiver By Southern)	
Communications Services d/b/a)	
SouthernLINC Wireless)	

To: The Commission

SOUTHERNLINC WIRELESS E911 PHASE II QUARTERLY REPORT:

NOVEMBER 1, 2006

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Dated: November 1, 2006

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**SOUTHERNLINC WIRELESS E911 PHASE II QUARTERLY REPORT:
NOVEMBER 1, 2006**

Pursuant to the *Order* of the Federal Communications Commission ("FCC" or "Commission") of November 3, 2005,¹ Southern Communications Services, Inc. d/b/a SouthernLINC Wireless ("SouthernLINC Wireless") hereby provides the Commission its quarterly report regarding the status of its efforts to achieve ninety-five percent penetration of automatic location identification (ALI)-capable handsets among its subscribers pursuant to Section 20.18(g)(1)(v) of the Commission's Rules, 47 C.F.R. § 20.18(g)(1)(v). SouthernLINC Wireless notes that it filed a Petition for Reconsideration and Clarification of the *Order* on December 5, 2005, which is still pending before the Commission, and clarifies that this quarterly status report is submitted separate from and

¹ / *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver by Southern Communications Services, Inc. d/b/a SouthernLINC Wireless*, CC Docket No. 94-102, Order, FCC 05-188 (rel. Nov. 3, 2005) ("*Order*") (granting SouthernLINC Wireless until November 3, 2006, to achieve ninety-five percent penetration of location-capable handsets among its subscriber base and requiring the filing of quarterly status reports).

without prejudice to its pending Petition.² SouthernLINC Wireless also notes that it is preparing to file an additional petition with the Commission requesting a further waiver of the deadline to achieve ninety-five percent penetration of location-capable handsets among its customer base.

I. BACKGROUND

On July 26, 2005, SouthernLINC Wireless, a “qualified Tier III carrier” as that term is defined in Section 107 of the *ENHANCE 911 Act*,³ submitted a Request for Waiver requesting a limited extension of the Commission’s December 31, 2005, handset deployment deadline to allow SouthernLINC Wireless an additional twenty-four months to achieve ninety-five percent penetration of location-capable handsets among its subscriber base.⁴ As set forth in the Request for Waiver and subsequent filings, SouthernLINC Wireless faces numerous challenges in its efforts to achieve the required level of penetration of location-capable handsets, including (i) a latent software defect in the Motorola A-GPS-equipped handsets used by SouthernLINC Wireless subscribers that rendered all A-GPS services in these handsets unusable for E911 location in July 2004; (ii) the substantial portion of handsets assigned to enterprise or government accounts that typically have long-term equipment replacement cycles and are both reluctant and resistant to upgrading from their current handsets to new location-capable handsets; and (iii) the number of SouthernLINC Wireless subscribers who utilize and rely on the range

² / Petition for Reconsideration and Clarification of SouthernLINC Wireless, CC Docket No. 94-102, filed December 5, 2005 (“Petition”).

³ / National Telecommunications and Information Administration Organization Act – Amendment, Publ. L. No. 108-494, 118 Stat. 3986 (1994) (“*ENHANCE 911 Act*”).

⁴ / Request for Waiver by SouthernLINC Wireless, CC Docket No. 94-102, filed July 26, 2005 (“Request for Waiver”).

and coverage of higher-power 1 watt and 3 watt phones and who are unwilling to upgrade to a lower-power (0.6 watt) location-capable handset, which could decrease their ability to receive any communications services – including emergency services – in remote areas.⁵

On November 3, 2005, the Commission released its *Order* granting SouthernLINC Wireless a limited ten-month extension of the ninety-five percent handset penetration deadline and requiring SouthernLINC Wireless to file status reports on a quarterly basis. On December 5, 2005, SouthernLINC Wireless filed a Petition for Reconsideration and Clarification of the *Order*. This Petition is still pending before the Commission. On July 24, 2006, SouthernLINC Wireless filed a Request for Further Waiver, seeking an additional extension of the ninety-five percent penetration deadline until December 31, 2007.⁶ On October 20, 2006, SouthernLINC Wireless submitted a request to the Commission for leave to withdraw without prejudice its Request for Further Waiver so that it could provide the Commission with additional relevant information on SouthernLINC Wireless' compliance efforts.⁷

⁵ / See, e.g., Request for Waiver at 2 – 3; See also SouthernLINC Wireless Notice of *Ex Parte* Presentation, CC Docket No. 94-102, filed September 9, 2005; SouthernLINC Wireless Response to Request for Additional Information Supporting its Request for Waiver of the E911 Phase II Handset Deployment Deadline, CC Docket No. 94-102, filed Oct. 26, 2005 (“Supplemental Filing”).

⁶ / Request for Further Waiver by SouthernLINC Wireless, CC Docket No. 94-102, filed July 24, 2006 (“Request for Further Waiver”).

⁷ / See SouthernLINC Wireless Request for Further Waiver of Section 20.18(g)(1)(v) of the Commission's Rules, CC Docket No. 94-102, filed Oct. 20, 2006 (“Withdrawal Request”).

II. INFORMATION REGARDING THE STATUS OF SOUTHERNLINC WIRELESS' E911 PHASE II DEPLOYMENT EFFORTS

In accordance with the *Order*,⁸ SouthernLINC Wireless provides the Commission with the following information regarding its E911 Phase II deployment status and efforts.

A. Number and Status of Phase II Requests from PSAPs

As of October 30, 2006, SouthernLINC Wireless had received 114 requests for Phase II service out of a total of 298 PSAPs in its service territory. SouthernLINC Wireless has completed deployment in response to 103 of these requests, with 11 requests still pending. With two exceptions, all pending requests are anticipated to be deployed within the six month deployment deadline. SouthernLINC Wireless has experienced delays in deployment with one PSAP due to issues involving the incumbent local exchange carrier. SouthernLINC Wireless has communicated regularly with the affected PSAP regarding deployment and is ready to complete deployment once the PSAP and the local exchange carrier have resolved their technical issues. A second PSAP has been experiencing issues with its equipment vendor and will not be ready for Phase II deployment until January 2007.

A chart summarizing SouthernLINC Wireless' deployment of E911 Phase I and Phase II service to PSAPs is provided as Attachment A. Pending Phase II requests are detailed in the chart enclosed as Attachment B.

Because SouthernLINC Wireless has chosen to deploy a handset-based solution to provide caller location data to PSAPs, it is currently capable of providing E911 Phase II service to any and all Phase II-capable PSAPs in its service territory.

⁸ / *Order* at ¶ 23.

B. Estimated Dates on Which Phase II Service Will Be Available to PSAPs Served by SouthernLINC Wireless' Network

As described above, SouthernLINC Wireless is capable of providing Phase II service to any requesting Phase II-capable PSAP in its service territory. Estimated deployment dates for pending Phase II requests are provided in the chart enclosed as Attachment B.

C. Status of Coordination Efforts With PSAPs for Alternative Handset Penetration Dates

SouthernLINC Wireless remains in constant communication with all PSAPs in its territory regarding E-911 services, its ability to provide Phase I and Phase II service, and any problems that may arise that affect service availability. These communications may be written or verbal, and they include information on SouthernLINC Wireless' ability to provide Phase II service to its customers and the degree to which its customers can benefit from Phase II capabilities. SouthernLINC Wireless' 911 services coordinator interacts with the 911 community on a regular basis, including attending meetings where she provides verbal updates on SouthernLINC Wireless' Phase II deployment status. Depending on the nature of the meeting, such information may be provided to all attendees in the form of a general announcement or may be targeted to interested parties in specific discussions.

Since the submission of SouthernLINC Wireless' 3rd Quarter 2006 Report,⁹ the 911 services coordinator has provided updates at the Northwest Alabama 911 Directors quarterly meeting (August 17, 2006), the Alabama Power Safety Section Meeting

⁹ / SouthernLINC Wireless E911 Phase II Quarterly Report: August 1, 2006, CC Docket No. 94-102, filed August 1, 2006 ("3rd Quarter 2006 Report").

(September 15, 2006), the Alabama NENA Gulf Coast Conference (October 16, 2006), and the Alabama NENA quarterly meeting (October 17, 2006).

As described in its previous quarterly status reports, SouthernLINC Wireless has undertaken a communications program for Phase II-capable PSAPs in its service territory focusing on the customer handset penetration issue.¹⁰ Specifically, SouthernLINC Wireless is providing these PSAPs with regular updates every two months via U.S. mail on the number of SouthernLINC Wireless customers using location-capable handsets and its progress towards the goal of ninety-five percent penetration of location-capable handsets. The most recent of these written updates was sent to PSAPs on September 29, 2006.

In addition, SouthernLINC Wireless always provides PSAPs with written confirmation of Phase II implementation once all activities, including testing, have been completed. These communications also include information on the number of SouthernLINC Wireless customers using location-capable handsets and its progress towards the ninety-five percent penetration goal. These PSAPs will also receive the regular mail updates described above.

D. Efforts to Encourage Subscribers to Reflash or Upgrade Handsets

To communicate with customers about E-911 services and capabilities, SouthernLINC Wireless launched a bill message communications plan for 2006 to provide information to its customers about E-911. The bill message runs twice each quarter. This bill message is designed to draw customers' attention to the issue of wireless E-911 service – as well as the need for an A-GPS-capable phone – and send

¹⁰ / See, e.g., *Id.* at 8.

them to a dedicated area on the SouthernLINC Wireless website for more details on E-911 services, including the availability of basic, Phase I, and Phase II services across SouthernLINC Wireless' service territory and information on which handset models are location-capable. A link to information on SouthernLINC Wireless' current handset promotions is also featured at this location so that customers can make decisions on handset upgrades, should they choose to do so. This section of the website was launched in early February 2006. In the second quarter, SouthernLINC Wireless also added a message about A-GPS handsets and 911 service to its "on hold" message at its customer support center, providing customers with another avenue from which to learn about the importance of location capabilities in emergency situations. Additional measures that SouthernLINC Wireless has undertaken in order to increase customer adoption of location-capable handsets as rapidly as possible are described in its Compliance Plan, which was filed with the Commission on May 3, 2006.¹¹

Since SouthernLINC Wireless filed its last quarterly report on August 1, 2006, it has both planned and undertaken additional measures to achieve E911 Phase II compliance, including:

- In August 2006, SouthernLINC Wireless sent a letter to all known subscribers without E911 Phase II compliant handsets. The letter urged customers to act and upgrade to A-GPS-capable phones in order to receive the additional safety benefits that the phones may provide. The letter also provided a strong incentive to upgrade by offering free phones (after rebate) and free minutes to all such subscribers who upgraded before

¹¹ / *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver by Southern Communications Services, Inc. d/b/a SouthernLINC Wireless*, CC Docket No. 94-102, SouthernLINC Wireless E911 Phase II "Compliance Plan," filed May 3, 2006, at 6 – 9. SouthernLINC Wireless hereby incorporates its Compliance Plan by reference.

October 4, 2006. This letter was followed up with a calling campaign to customers receiving the letter.

- In the third quarter 2006, SouthernLINC Wireless offered rebates to existing subscribers on almost all phones it offers. As a result of these rebates, two models of A-GPS capable phones were available to customers for free, with the remaining models significantly reduced in price.
- In the fourth quarter 2006, SouthernLINC Wireless introduced and is currently running a “buy one, get one free” offer for five different handset models and is offering a sixth handset model for free with a mail-in rebate.
- SouthernLINC Wireless launched a data service promotion in the fourth quarter of 2006 that provides customers with a free trial of SouthernLINC Wireless’ Telenav location service. This service requires an A-GPS-capable phone, thus providing customers yet another reason to switch handsets.
- SouthernLINC Wireless plans to launch BlackBerry service later this year. While subscriber uptake of the Phase II compliant BlackBerry devices will include customers that already have compliant handsets, SouthernLINC Wireless believes that a portion of its prospective BlackBerry customers will be converting from non-compliant phones.

In addition, SouthernLINC Wireless is currently working with Motorola on implementing a system-wide audit of the handsets currently activated on SouthernLINC Wireless’ network in order to specifically identify individual handsets affected by the A-GPS software defect that must still be reflashed or upgraded in order to restore their location capability. This information will enable SouthernLINC Wireless to focus its efforts and resources towards specific customers, thus allowing for the development and implementation of even more targeted marketing, outreach, promotional, and other measures to bring customer handsets into compliance. SouthernLINC Wireless will provide additional information regarding this audit in a forthcoming filing with the Commission.

E. Extent of Subscribers Having Higher-Power, Non-A-GPS Handsets

Approximately [] percent of SouthernLINC Wireless customers currently use high-power handsets which are not location-capable.

F. Percentage of Customers With Location-Capable Handsets

Approximately 68.2 percent of SouthernLINC Wireless customers currently use location-capable handsets.

G. Status in Achieving Compliance

Although SouthernLINC Wireless faces numerous challenges in its efforts to achieve ninety-five percent penetration of location-capable handsets among its subscribers, it is committed to achieving full compliance as quickly as possible and has made significant progress towards this goal. As a result of the variety of outreach, promotional, and marketing efforts it has undertaken, SouthernLINC Wireless has succeeded in increasing its level of penetration of location-capable handsets from approximately forty-three percent on October 31, 2005, to approximately 68.2 percent as of November 1, 2006. SouthernLINC Wireless is now building on these positive results in order to further accelerate customer adoption of location-capable handsets through additional promotional and outreach measures such as those described in Section II. D. above.

SouthernLINC Wireless believes that it will be able to achieve the ninety-five percent penetration level and will continue to put forth substantial effort and resources into doing so. However, SouthernLINC Wireless, despite its best efforts, is not on schedule to achieve this level by the revised deadline of November 3, 2006. As set forth in its pending Petition for Reconsideration and Clarification, SouthernLINC Wireless

does not believe that the ten-month extension granted by the Commission provides sufficient time in light of the extraordinary circumstances of its situation.¹²

SouthernLINC Wireless, while having made every effort to achieve compliance as rapidly as possible, requires additional time to reach the ninety-five percent penetration level due to the extraordinary circumstances that it has faced, and is therefore preparing to file an additional petition with the Commission requesting a further waiver of the deadline to achieve ninety-five percent penetration of location-capable handsets among its customer base.

III. CONCLUSION

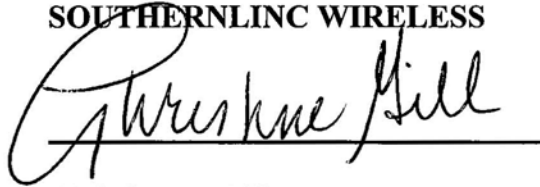
As demonstrated above, SouthernLINC Wireless is continuing to put forth substantial effort and resources into migrating as much of its subscriber base as possible to location-capable handsets, and it is committed to achieving full compliance with the Commission's handset penetration requirement as quickly as possible.

¹² / Petition at 16 – 18.

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Respectfully submitted,

SOUTHERNLINC WIRELESS

A handwritten signature in black ink, appearing to read "Christine M. Gill", is written over a horizontal line.

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Dated: November 1, 2006

ATTACHMENT A

E911 Phase I and Phase II Deployment to PSAPs

Legal External Affairs
Project Status Report

E911 Phase I and II



SouthernLINC Wireless External Affairs
Project Update

A Southern

Last Reviewed: 10/30/2006

911 Deployments

Status as of October 30, 2006		Phase 1 Requests					Phase 2 Requests				
911 Implementation	Total PSAPs	Total Rec'd	Total Pending	Total Deployed	2006 Deployments	Total Past Deployment Deadline	Total Rec'd	Total Pending	Total Deployed	2006 Deployments	Total Past Deployment Deadline
AL	83	68	0	68	5	0	46	1	45	12	0
FL	12	11	1	10	3	0	10	2	8	2	0
GA	179	95	16	79	15	0	52	7	45	28	0
MS	24	11	0	11	3	0	6	1	5	2	0
Total	298	185	17	168	26	0	114	11	103	44	0

Status as of December 31, 2005		Phase 1 Requests					Phase 2 Requests				
911 Implementation	Total PSAPs	Total Rec'd	Total Pending	Total Deployed	2005 Deployments	Total Past Deployment Deadline	Total Rec'd	Total Pending	Total Deployed	2005 Deployments	Total Past Deployment Deadline
AL	83	63	0	63	2	0	34	1	33	8	0
FL	12	8	1	7	1	0	7	1	6	1	0
GA	179	67	3	64	23	0	23	6	17	12	0
MS	24	9	1	8	1	0	4	1	3	1	0
Total	298	147	5	142	27	0	68	9	59	22	0

ATTACHMENT B

Status of Pending E911 Phase II Requests

Phase 2 Outstanding Request Status as of 10/30/2006

State	PSAP Name	P2 6 Mo Deployment Due Date	Scheduled P2 Deployment Date	Notes
AL	Dallas County AL 911	31-Jan-07	2-Nov-06	Provisioning completed/Testing scheduled w/ PSAP
FL	Gadsden County FL 911	26-Oct-06	N/A	PSAP not ready until 1-2007/Equipment vendor issues
FL	Santa Rosa County FL 911	26-Jul-06	N/A	PSAP not ready/LEC issues
GA	Forsyth County GA 911	28-Feb-07	TBD	Provisioning completed/Working w/ PSAP to finalize test/deployment date
GA	Greene County GA 911	28-Feb-07	TBD	Provisioning in process/Working w/ PSAP to finalize test/deployment date
GA	Savannah Chatham Metropolitan E911	01-Mar-07	TBD	Provisioning completed/Working w/ PSAP to finalize test/deployment date
GA	Toombs County GA 911	18-Feb-07	TBD	Provisioning completed/Working w/ PSAP to finalize test/deployment date
GA	Turner County GA 911	24-Jan-07	2-Nov-06	Provisioning completed/Testing scheduled w/ PSAP
GA	Upson County GA 911	23-Feb-07	TBD	Provisioning in process/Working w/ PSAP to finalize test/deployment date
GA	Ware County GA 911	26-Mar-07	TBD	Provisioning in process/Working w/ PSAP to finalize test/deployment date
MS	Clarke County MS 911	13-Mar-07	TBD	Provisioning completed/Working w/ PSAP to finalize test/deployment date